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**LAW DEPARTMENT**  
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**VIA ECF**

Hon. Vernon S. Broderick  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

APPLICATION GRANTED

SO ORDERED *Vern Bro*

VERNON S. BRODERICK

U.S.D.J. 1/20/2021

January 19, 2020

Re: *R.A. and B.A. obo A.A. v. New York City Department of Education*  
20-C V-4275 (VSB) (SN)  
Second Request for Extension of Time to File Joint Letter

Dear Judge Broderick:

I am the Assistant Corporation Counsel with the New York City Law Department assigned to represent Defendant New York City Department of Education in the above-referenced action wherein Plaintiff seeks to recover attorney's fees incurred in the course of administrative proceedings brought under the Individuals with Disabilities Education Act, 20 U.S.C. § 1400, *et seq.* and this action. I write on behalf of the parties to respectfully request a 3-week extension of the parties' time to file a joint letter, from January 18 to February 8, 2021. This is the second request for such an extension.

The parties humbly apologize for their failure to make this application in a timely manner. We regret any inconvenience this may cause the Court. The undersigned takes full responsibility for this lapse, which is due in part to COVID-19 related administrative difficulties, and in part to a sudden increase in IDEA cases without a concomitant increase in legal and administrative staff. We respectfully request that the deadline to file a joint letter be further extended three weeks to February 9, 2021. The parties have been in communication with each other and feel they are close to resolving this matter without the need for further litigation. We note that the Defendant and the Dayan firm have successfully resolved all similar actions for IDEA fees over the past several years without need of Court intervention. In that regard, Defendant has requested authority to settle this matter for a sum certain, and is awaiting approval from the Office of the City Comptroller.

Accordingly, I respectfully request that the deadline for the parties to file a joint letter be extended from January 18, 2021 to February 9, 2021.

Thank you for your consideration.

Respectfully,

s/ Martin Bowe

Martin Bowe

Assistant Corporation Counsel

cc: Law Offices of Adam Dayan (*by ECF*)  
Attorneys for Plaintiffs